

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-227-1-JLS

JOSEPH BONGIOVANNI,

Defendant.

DEFENDANT JOSEPH BONGIOVANNI'S
TRIAL EXHIBIT LIST

Defendant Joseph Bongiovanni, by and through his attorneys, submits this exhibit list setting forth exhibits the defense may use during the trial.

As an initial matter, if the government has included as exhibits on its exhibit list material that has been produced to the defense pursuant to 18 U.S.C. § 3500 (hereinafter “3500 material”). The defense intends to use 3500 material as substantive evidence and to impeach the government’s witnesses, where appropriate, so the defense reserves its right to use any and all 3500 material as defense exhibits (including 3500 material that is not listed on the government’s witness list). To avoid needless duplication, the 3500 material is not being re-marked and re-listed on this defense exhibit list.

In the event the government adds additional exhibits to its exhibit list and/or discloses additional material owed pursuant to 18 U.S.C. § 3500 and *Giglio v. United States*, 405 U.S. 150 (1972), Mr. Bongiovanni reserves his right to supplement this exhibit list based upon receipt of these materials and based upon the proof the government introduces at trial.

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

Case No. 19-CR-227-1-LJV

**DEFENDANT JOSEPH BONGIOVANNI'S
TRIAL EXHIBIT LIST**

Exhibit	Description	Date	
		Marked for ID	Admitted
A	Bongiovanni Wedding Photo, Cabo San Lucas, Mexico		
B	Joseph Bongiovanni Retirement Documents		
C	221 Lovering Avenue Rental Leases Compendium (2009-2019)		
D	Joseph Dantonio DEA File (CS-10-134504)		
E	Michael Massey DEA Case File (C2-10-0144)		
E.1	Excerpt from Michael Massey DEA Case File (C2-10-0144) – Peter Militello DEA-6 entries		
F	Wayne Anderson DEA Case File (C2-13-0026)		
F.1	Excerpt from Wayne Anderson DEA Case File (C2-13-0026) – Robert Kaiser May 2013 Buy Operation Plans (Unredacted)		
G	[RESERVED]		
H.1	Email string between J. Bongiovanni, D. Turri, J. Flickinger, S. Bevilacqua, and S. Nastoff re: SERIO Investigation – 132 Rhode Island, Buffalo, NY dated 5/23/2013 12:23pm		
H.2	Email from J. Flickinger to T. Foley re: C2-13-0026/YCM2B; ANDERSON, Wayne dated March 27, 2013 4:40pm		
H.3	Email from J. Flickinger to S. Bevilacqua re: SERIO Investigation – 132 Rhode Island, Buffalo, NY dated 5/23/2013 11:37am		

I	[RESERVED]		
J	[RESERVED]		
K.1	DEA GS Mark Gentile Signature Examples (Unredacted)		
K.1	DEA GS Mark Gentile Signature Examples (Redacted)		
K.3	DEA GS Mark Gentile Signature Demonstrative		
L.1	DEA SA David Leary Signature Examples (Redacted)		
L.2	DEA SA David Leary Signature Demonstrative		
M	2013 Listing Pictures of 85 Alder Place, Tonawanda, NY		
N	Erie County Support Collection Unit records re: Lindsay Bongiovanni (Redacted)		
O.1	T. Devereaux Chart – Receipts Compared to Expected Rent		
O.2	T. Devereaux Chart – Account Excess (Shortfall) for Jospeh & Lindsay Bongiovanni		
P	Picture of CD-ROM re: C2-04-0018 (Mouse Trap) dated 3/5/2008 (Puerto Rico)		
Q	Certified Records from KeyBank, N.A. re: cashed rent checks from Kevin Whalen's bank account		
R.1	DEA SA Christopher Wisniewski Signature Demonstrative		
U.1	Lou Selva Cellbrite Web History – Prison Articles		
U.2	8/11/2019 Yahoo News/ABC News Article re: Prison Experiences of Two Politicians who served time in prison		

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Dated: September 9, 2024
Williamsville, New York

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